



USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 12/23/2024

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December 20, 2024

Via SDNY ECF

Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

Re: Michael Zablauskas v. The Department of Education of the City of New York, No. 24-CV-5633 (MKV)

Your Honor:

I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, attorney for the Defendant in the above-referenced matter. I am a supervisor for Katherine Dunayevich, who has been assigned to this matter but is not yet admitted to SDNY. I am accordingly filing this letter on her behalf.

I write to respectfully request, on consent, a 14-day extension, from December 30, 2024 to January 13, 2025, to file Defendant's motion to dismiss the Amended Complaint. This is Defendant's first request for an extension of time to file its motion to dismiss. The extension will allow Ms. Dunayevich sufficient time to draft and file Defendant's motion to dismiss. In the past few weeks, Ms. Dunayevich was out of the office on a previously-scheduled vacation from December 5 to December 12, 2024, unexpectedly out sick on December 18, 2024, and, further, the office is closed for Christmas Day on December 25, 2024. Additionally, the undersigned will be on a previously-scheduled vacation from December 23 through December 31. Defendant accordingly respectfully requests a 14-day extension to file its motion to dismiss.

I thank the Court for its consideration herein.

Respectfully submitted,

/s/ Christopher G. Arko
Christopher Arko
Assistant Corporation Counsel

Katherine A. Dunayevich
Katherine A. Dunayevich
Assistant Corporation Counsel

cc: All Counsel of Record via SDNY ECF.

GRANTED. Defendant shall file its contemplated motion to dismiss on or before January 13, 2025. Further briefing shall be submitted on the schedule set forth in Local Rule 6.1(b).

SO ORDERED.

Date: 12/23/2024
New York, New York

Mary Kay Vyskocil
Mary Kay Vyskocil
United States District Judge